

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MAJOR LEAGUE BASEBALL
PROPERTIES, INC. and CHICAGO CUBS
BASEBALL CLUB, LLC,

Plaintiffs,

v.

Civil Action No. 1:16-cv-09140

TOUSSIANT STEVENS; STEVE
RUSSELL; RICHARD JEKEL; HOWARD
KADET; PETE GADBERRY; HARRY
GIBSON, individually and d/b/a Offcenter
Marketing; JASON ALSPAUGH,
individually and d/b/a Chi Apparel; LARRY
BOISSEAU; BYRON YABLON; JOHN
YABLON; JOSE VILLAREAL; RAMON
RIOS; RICHARD WELLS; DEESCO
PERRIMAN; MICHAEL QUATRINE;
RAYMOND MILLER; GARVIN
WALKER; JAMES PINKIN JR.;
ROBERTO RAMIREZ; THOMAS RUSSO;
RENEE SMITH; TAHA MANIYA,
individually and d/b/a E-Z Connections;
DONALD SIMON; JAKE O'REILY;
MATTHEW COLE; FRED FULTON;
ASEZAM RAHMAN; FAHIYM AHMAD
NASIR; LANITA COX; ADVANCE
DISTRIBUTORS INC.; RICKEY LIAS JR.;
ALFRED CURRY, individually and d/b/a
National Team Sports; KYLE SMITH; and
DOES 1-30,

Defendants.

**MOTION FOR ENTRY OF A CONSENT JUDGMENT
AND PERMANENT INJUNCTION AGAINST
DEFENDANT ADVANCE DISTRIBUTORS, INC.**

Plaintiffs Major League Baseball Properties, Inc. and Chicago Cubs Baseball Club, LLC
(collectively, "Plaintiffs") respectfully move this Court for entry of a consent judgment and
permanent injunction against Defendant Advance Distributors, Inc. in the proposed form
attached to this motion. As reflected in the signatures on page 8, Plaintiffs and Defendant

Advance Distributors, Inc. consent to entry of the judgment and permanent injunction.

Respectfully submitted,

/s/ Brian O. Watson

Matthew C. Crawl

mcrawl@rshc-law.com

Brian O. Watson

bwatson@rshc-law.com

RILEY SAFER HOLMES & CANCILA LLP

Three First National Plaza

70 W. Madison Street, Suite 2900

Chicago, Illinois 60602

Telephone: (312) 471-8700

Facsimile: (312) 471-8701

KILPATRICK TOWNSEND & STOCKTON LLP

R. Charles Henn Jr. (*pro hac vice*)

chenn@kilpatricktownsend.com

Jennifer Fairbairn Deal (*pro hac vice*)

jdeal@kilpatricktownsend.com

1100 Peachtree Street, Suite 2800

Atlanta, GA 30309

Telephone: (404) 815-6500

Facsimile: (404) 815-6555

Counsel for Plaintiffs Major League Baseball Properties,
Inc. and Chicago Cubs Baseball Club, LLC